

**PSJ4 SOL Opp Exh 42**

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE NORTHERN DISTRICT OF OHIO  
3                   EASTERN DIVISION

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7                   IN RE:

8                   NATIONAL PRESCRIPTION OPIATE                   MDL No. 2804  
                  LITIGATION                                       Case No. 17-md-2804  
9   Hon. Dan A. Polster

                  This document relates to:

10

                  All cases

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13                   HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
14                   CONFIDENTIALITY REVIEW

15                   VIDEOTAPED DEPOSITION OF:

16   AMY PROPATIER

17   MOTLEY RICE

18   55 Cedar Street

19   Providence, Rhode Island

20                   November 29, 2018                   9:15 a.m.

21

22   Darlene M. Coppola

23   Registered Merit Reporter

24   Certified Realtime Reporter

1           answered.

2           A.     Yes.

3           BY MR. BAKER:

4           Q.     Yes?

5           A.     Yes.

6           Q.     Okay. And would you please direct

7           your attention to page X-5, which is 10-5,

8           Paragraph 11, last sentence?

9                     Do you see that?

10          A.     Uh-huh.

11          Q.     Yes?

12          A.     Yes.

13          Q.     Your name is Amy Propatier, correct?

14          A.     Yes.

15          Q.     And this document says that "Amy

16          Propatier (CVS DEA compliance coordinator) and

17          Frank Devlin, director of logistics loss

18          prevention." Is that correct?

19          A.     Yes.

20          Q.     Were you, at the time of this

21          document, the CVS DEA compliance

22          coordinator?

23                     MR. BUSH: Well, objection.

24          A.     That was a title for reference in

1 SOPs. My title -- my job position title was  
2 logistics pharmacy services manager.

3 BY MR. BAKER:

4 Q. Did you ever hold the title of CVS DEA  
5 compliance coordinator?

6 A. Yes. As a title for SOP reference,  
7 yes.

8 Q. And did you perform duties as a DEA  
9 coordinator or not -- DEA compliance  
10 coordinator for CVS? Let me repeat the  
11 question.

12 Did you perform duties as a CVS DEA  
13 compliance coordinator while under the employ  
14 of CVS?

15 A. What type of duties? I don't know  
16 what you mean.

17 Q. Did you perform any type of DEA  
18 compliance coordinator duties while under the  
19 employ of CVS?

20 A. I submitted ARCOS reporting, yes.

21 Q. Did you have anything at all to do  
22 with suspicious order monitoring?

23 MR. BUSH: Objection, but you  
24 can answer.

1           A.    No, only updating the SOP with what  
2           was provided for the program.

3           Q.    Let's go to the next numbered exhibit.

4                   Now, who, other than this document,  
5           ever called you by the title CVS DEA  
6           compliance coordinator? Who within the  
7           company ever called you that other than this  
8           document?

9                   MR. BUSH: Objection. If you  
10          understand, you can answer.

11          A.    I don't -- I'm not sure what you mean.

12          BY MR. BAKER:

13          Q.    You've told me about your logistics  
14          title, correct?

15          A.    Yes.

16          Q.    And name that title again, what it is.

17          A.    Logistics pharmacy services manager.

18          Q.    At any place within CVS, other than  
19          within this document that I showed you, were  
20          you ever listed within CVS as a DEA compliance  
21          coordinator?

22          A.    Do you mean like in personnel, like as  
23          the company?

24          Q.    Yes, ma'am.

1 A. Not in personnel records, no.

2 Q. Okay. Do you know why CVS put you in  
3 here as the CVS DEA compliance coordinator  
4 within their controlled drug DEA Standard  
5 Operating Procedures Manual?

6 A. It was a title just for SOP purposes  
7 because people change positions, that it would  
8 be -- that would be the position they referred  
9 to because the person in title may change. So  
10 if they had one specific title for this point  
11 of contact, it could change if the person or  
12 position changed.

13 Q. Were you ever the CVS DEA compliance  
14 coordinator?

15 A. In regards to?

16 Q. Your job at CVS.

17 A. My job was the pharmacy services  
18 manager. This title was for SOP purposes.

19 Q. Were you ever -- for personnel  
20 purposes ever considered the CVS DEA  
21 compliance coordinator?

22 A. No, I was not.

23 Q. It's just something that's listed  
24 within the Controlled Drug DEA Standard